

13E. Audit Program

Regulations: 180 NAC 4-004, 180 NAC 4-047.

Criteria: *Licensees must review the content and implementation of their radiation protection programs annually to ensure the following:*

- *Compliance with the Agency and DOT regulations, and the terms and conditions of the license;*
- *Occupational doses and doses to members of the public are as low as reasonably achievable (ALARA) (180 NAC 4-004); and*
- *Records of audits and other reviews of program content are maintained for 5 years.*

Appendix O contains a suggested audit program that is specific to the use of portable gauges and is acceptable to Agency. All areas indicated in Appendix O may not be applicable to every licensee and may not need to be addressed during each audit.

Currently the Agency's emphasis in inspections is to perform actual observations of work in progress. As a part of their audit programs, applicants should consider performing unannounced audits of gauge users in the field to determine if, for example, Operating and Emergency Procedures are available, are being followed, etc.

The RSO needs to ensure that the annual audits are conducted, but does not necessarily need to do it himself/herself. In fact, if the RSO is one of the authorized gauge users, it may be beneficial for a qualified individual (e.g., radiation safety consultant, the corporate radiation safety office) who is not associated with day-to-day operations to conduct the audit. Specify who will perform this function.

These audits may be conducted as "mini inspections" and may include observation of some or all of the licensee's authorized users during actual or simulated use of portable gauges. Inspections have identified the following as common violations among portable gauge licensees: failure to perform leak test or conduct inventories at the required frequency; failure to transport gauges in compliance with DOT regulations; unauthorized personnel using gauges independently; possession and use of sealed sources/device combinations other than those specified on the license; and unauthorized individual as RSO.

It is essential that once identified, problems be corrected comprehensively and in a timely manner. The Agency will review the licensee's audit results and determine if corrective actions are thorough, timely, and sufficient to prevent recurrence. If violations are identified by the licensee and these steps are taken, the Agency can exercise discretion and may elect not to cite a violation. The Agency's goal is to encourage prompt identification and prompt, comprehensive correction of violations and deficiencies.

With regard to audit records, 180 NAC 4-047.01 requires licensees to maintain records of "... audits and other reviews of program content and implementation." The Agency has found audit records that contain the following information to be acceptable: date of audit, name of person(s) who conducted audit, persons contacted by the auditor(s), areas audited, audit findings, corrective actions, and follow-up.

Response From Applicant:

- “We will have an audit program.”

Note: See Appendix O for a sample audit program. The audit program will be reviewed during an inspection.